

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

EZRA SMITH,

Plaintiff,

v.

Case No. 1:24-cv-05158-TWT

DEPUTY MONIQUE TRACEY, *et al.*,

Defendants.

PLAINTIFF'S MOTION TO SEAL

Pursuant to the Court's Order Granting Consent Protective Order (the "Protective Order") (Doc. 50), Plaintiff Ezra Smith moves for leave to file Naphcare's Policy B-05 Suicide Prevention and Intervention (Doc. 90-1) under seal. As grounds, Plaintiff states:

1. This is a civil rights lawsuit against detention deputies and a nurse involving Plaintiff's suicide attempt at the Rockdale County Jail.
2. To obtain production from nonparty Naphcare, which maintains custody of policies and records involving nursing staff at the jail, the parties entered into the Protective Order.
3. Under the Protective Order, parties may designate records as "confidential."

4. Naphcare produced Policy B-05 Suicide Prevention and Intervention with a “confidential” designation.

5. Plaintiff filed that policy (Doc. 90-1) in support of his responses to Defendant Erica Sanchez’s motion for summary judgment.

6. While Naphcare’s policies and procedures relevant to its providers’ roles at the Rockdale County Jail may be subject to the Open Records Act and therefore publicly available, because Napchare has designated this record as “confidential,” Plaintiff files this motion to comply with the Protective Order.

WHEREFORE, Plaintiff Ezra Smith respectfully requests that the Court grant this motion and maintain Naphcare’s Policy B-05 Suicide Prevention and Intervention (Doc. 90-1) under seal.

Dated: January 12, 2026.

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CERTIFICATE OF COMPLIANCE

Pursuant to Local Rule 7.1(D), I hereby certify that the foregoing has been prepared in compliance with Local Rule 5.1(B) in Times New Roman 14-point typeface.

Dated: January 12, 2026.

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